## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:	)
GENERAL MOTORS LLC IGNITION SWITCH LITIGATION	) No. 14-MD-2543 (JMF No. 14-MC-2543 (JMF
This Document Relates to the Plaintiffs in the Actions Listed on the Attached <u>Exhibit A</u>	Hon. Jesse M. Furman )

## MOTION FOR ORDER PERMITTING SUBMISSION OF MEMORANDUM AND DECLARATION IN SUPPORT OF MOTION TO WITHDRAW UNDER SEAL AND IN CAMERA

Hilliard Martinez Gonzales (formerly Hilliard Muñoz Gonzales) and Thomas J. Henry Injury Attorneys (together hereinafter the "Firms"), respectfully request an Order permitting the Firms to file their Memorandum in Support of the Firms' Motion to Withdraw as Counsel and Declaration in Support of the Firms' Motion to Withdraw as Counsel, under seal and *in camera*. Because the Memorandum in Support and Declaration reflect both confidential and attorney-client privileged information and attorney opinion work product, the Firms respectfully request that the Court permit the Firms to submit the Declaration under seal and *in camera* (that is, filing under seal and submission to the Court by email without disclosure to any other parties). The Firms have filed a Memorandum in Support of this Motion.

Dated: December 6, 2019

Respectfully submitted,

/s/ Robert C. Hilliard

Application GRANTED. The Clerk of Court is directed to docket this in 14-MD-2543, 14-CV-6924, and 15-CV-5528. The Clerk of Court is further directed to terminate 14-MD-2543, ECF No. 7578; 14-CV-6924, ECF No. 334; and 15-CV-5528, ECF No. 169. SO ORDERED.

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December 9, 2019

## -and-

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